UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

SHERRY LYNNE GUTSHALL

CASE NO. 1:12-bk-06956

Debtor

:

MOTION FOR ORDER TO PAY TRUSTEE

Comes now, Sherry Lynne Gutshall, by and through Dorothy L. Mott Law Office, LLC and requests an Order to pay Trustee, respectfully representing in support thereof:

- 1. The Debtor filed a Chapter 13 petition at the above-captioned docket number.
- 2. The Debtor receives regular income from employment which may be attached under 11 U.S.C. Section 1326 to fund the Chapter 13 Plan.
- 3. The likelihood of success in this case will be much greater if the income is attached to fund the Plan.
 - 4. The Debtor consents to the wage attachment.

Wherefore, the Debtor respectfully requests that this Court enter an Order to pay Trustee in the form attached.

Respectfully submitted,

/s/ Dorothy L. Mott

doriemott@aol.com

Dorothy L Mott, Esquire Attorney ID #43568 Mott & Gendron Law 125 State Street Harrisburg PA 17101 (717) 232-6650 TEL (717) 232-0477 FAX

/s/Sherry Lynne Gutshall

SHERRY LYNNE GUTSHALL

UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

SHERRY LYNNE GUTSHALL :

Debtor : CASE NO. 1:12-bk-06956

:

ORDER TO PAY TRUSTEE

Upon consideration of the Motion for Wage Attachment, it is hereby ORDERED that until further Order of this Court the entity from whom the Debtor, Sherry Lynne Gutshall, receives income:

DFAS-DGG-CL GARNISHMENT OPERATIONS PO BOX 998002 CLEVELAND, OH 44199-8002

deduct from said income the sum of \$150.00 from each two-week pay check, or \$75.00 from each weekly paycheck, as appropriate, beginning on the next pay day following receipt of this Order and deduct a similar amount each pay period thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination or other benefits arising out of present or past employment, or from any other benefits payable to the Debtor and to remit the deductible sums to:

CHARLES J DEHART III ESQUIRE PO BOX 7005 LANCASTER, PA 17604

and to change the amount of the monthly remittance to the Trustee in the future, if the Employer is directed to do so in writing, either by the Trustee or by the Debtor's counsel and to continue the monthly wage attachment until the Employer is directed in writing to discontinue the attachment, either by the Trustee or Debtor's counsel.

IT IS FURTHER ORDERED that the employer shall change the amount of the monthly remittance to the Trustee in the future, if the Employer is directed to do so in writing, either by the Trustee or by the Debtor's counsel and to continue the monthly wage attachment until the Employer is directed in writing to discontinue the attachment, either by the Trustee or Debtor's counsel.

IT IS FURTHER ORDERED that the entity from whom the Debtor receives income shall notify the Trustee if the Debtor's income is terminated and the reason therefore.

IT IS FURTHER ORDERED that all remaining income of the Debtor, except the amounts required to be withheld for taxes, social security, insurance, pension, or union dues be paid to the Debtor in accordance with usual payment procedure.

IT IS FURTHER ORDERED that this Order shall terminate without further order upon certification that the obligation of the Debtor has been fulfilled, if it is not terminated by earlier order of this Court.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

SHERRY LYNNE GUTSHALL :

Debtor : CASE NO. 1:12-bk-06956

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on October 27, 2016, I served a copy of the foregoing document(s) electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows on the following parties:

Name and Address	Mode of Service
CHARLES J DEHART, III dehartstaff@pamd13trustee.com	Electronically
SHERRY LYNNE GUTSHALL 2309 DERRY STREET HARRISBURG, PA 17104	Electronically
DFAS-DGG-CL GARNISHMENT OPERATIONS PO BOX 998002 CLEVELAND, OH 44199-8002	First Class Mail, Postage Prepaid

I certify under penalty of perjury that the foregoing is true and correct.

Date: 10/27/2016

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L Mott, Esquire

Attorney ID #43568 Mott & Gendron Law 125 State Street Harrisburg PA 17101 (717) 232-6650 TEL (717) 232-0477 FAX doriemott@aol.com